

Voluntary Remediation Program

- RI SC User Guide – Chapter 4
- Highlight new VRP program developments resulting from staff efforts to replace the existing program guidance manual and integrate RI SC



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VRP Program Limitations

- Off-Site Source of Contamination
 - If property access not obtainable or desired, then Participant will have difficulty performing necessary investigation/remediation
- RCRA
 - RCRA MOU -
 - Facility-wide Assessment
 - All releases from SWMU or AOC (on and off-site)
 - Public Comment



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VRP Project Considerations

- Know the Administrative Process
- Familiarize yourself with everything RI SC
- Consider VRP Oversight Costs – sliding scale
- Refer to User Guide – Appendix 1



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VRP Project Considerations Cont.

- Determine the Level of Liability Coverage Desired – Limited to Matters Addressed in The Remediation Work Plan
- Entire Facility or a Portion
- Residential or Industrial Land-use Restrictions
- RI SC Default or Nondefault?



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New RI SC-Integrated VRP Process

- New VRP Application -
www.state.in.us/ide/olq/programs/vrp/index.html
 - Revamped Contaminant Table
- More User Friendly (better reflects RI SC terminology)
 - Attachments
 - Co-Applicant
 - Multi-program sensitive



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New RI SC-Integrated VRP Process Cont.

- Evaluate Existing Information
- Presampling Activities
 - Facility-wide Liability Coverage (RI SC Area Definitions)
 - Specific Area Liability Coverage
- Optional Area Screening



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New RISC-Integrated VRP Process Cont.

- **Selecting Chemicals of Concern & Media**
- VRP participants usually address all of a known area or contamination event
- Participants can propose to eliminate from further consideration particular COCs, media, or exposure pathways with adequate demonstrations
- Adequate demonstrations via RISC default or nondefault procedures



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New RISC-Integrated VRP Process Cont.

- **Determine Nature and Extent** (User Guide Appendix 1)
- **Remediation Work Plan** (User Guide Appendix 1)
 - Community Relations Plan
 - Progress Reporting



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New RISC-Integrated VRP Process Cont.

- **Community Relations Plan** - Draft Nonrule Policy document - posted on VRP Webpage
 - Applies to all VRP applications approved after effective date of policy
 - Additional written notification to Owners, Occupants, Neighborhood Organizations, and Sensitive Community Institutions
 - Signage
 - When? At end of Public Notice period & before work begins until CNTS issued



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New RISC-Integrated VRP Process Cont.

- **Community Relations Plan** - Check VRP Webpage for latest
 - Signage
 - When? At end of Public Notice period & before work begins until CNTS issued
 - Site Specific Exceptions to Signage
 - Project already meets targeted cleanup goals
 - No active remediation is occurring or cleanup is of short duration
 - soil is not being disturbed, pits & piles not created



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New RISC-Integrated VRP Process Cont.

- **Project Closure**
 - W/out Institutional Controls (Residential Levels)
 - W/ Institutional Controls (Industrial Levels)
- **Issuance of Certificate of Completion/Covenant Not To Sue**
 - After appropriate confirmation data submission (Almost immediate, 2 years, 3 years, 5 years or 7 years)



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Successful VRP Project Formulations Steps

- **To Insure VRP Project Closure**
 - Correctly Select an area(s) for direct contact, migration to groundwater and groundwater assessment
 - Identify an inclusive Chemicals of Concern list
 - If necessary, demonstrate the elimination process for certain COCs and media from further investigative work
 - Coordinate confirmatory sampling events w/ VRP



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RISC - VRP Transition Policy

- February 15th, 2001 - February 15th, 2002
- Voluntary Remediation Agreement (VRA)**
 - Any necessary VRA modifications approved and VRA signed by IDEM before 2/15/02
 - Final IDEM-approved draft of VRA signed and submitted by Applicant before 2/15/02 and VRA is approved and signed by IDEM
- If these conditions are not met before transition deadline (2/15/02), then RISC**

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RISC Investigation Report

- Investigation**
 - Background/History Characteristics
 - Screening
 - Nature and Extent
 - Pathways/Receptors
 - Conclusions Next Step Recommendations

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RISC Remediation Work Plan

- Remediation/Monitoring**
 - Objectives
 - Remedy Selection
 - Quarterly Progress Reports
 - Conclusions and Justification

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RISC Closure Report

- Project Closure**
 - Objectives and Justifications
 - Institutional Controls

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RISC Report Outlines - User Guide Appendix 1

INVESTIGATION

REMEDIATION

CLOSURE

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